UNITED STATES DISTRICT COURT WESTERN DISTRICT OF NEW YORK

MARY VAN BRUNT-PIEHLER,

NOTICE OF MOTION

Plaintiff,

Civil Action No. 16-CV-6313-EAW-MWP

ABSOLUTE SOFTWARE, INC., ABSOLUTE SOFTWARE CORPORATION, GEOFF HAYDON, THOMAS KENNY, and TODD AWTRY,

 ν .

Defendants.

MOTION BY: Plaintiff Mary Van Brunt-Piehler.

RELIEF REQUESTED: An Order compelling defendants to produce entire

personnel files.

BASIS FOR RELIEF REQUESTED: Federal Rule of Civil Procedure 37(a)

SUPPORTING PAPERS: Memorandum of Law in Support of Plaintiff's

Motion to Compel Entire Personnel Files

PLACE: United States District Court

Western District of New York 2330 United States Courthouse

100 State Street

Rochester, New York 14614

DATE AND TIME: To be determined by the Court.

REPLY PAPERS: Pursuant to Local Rule 7(a)(1), plaintiff intends

to file and serve reply papers.

Dated: May 31, 2018

THOMAS & SOLOMON LLP

By: /s/ Jonathan W. Ferris

J. Nelson Thomas, Esq. Jonathan W. Ferris, Esq. Attorneys for Plaintiffs 693 East Avenue

Rochester, New York 14607 Telephone: (585) 272-0540

nthomas@theemploymentattorneys.com jferris@theemploymentattorneys.com